

RECEIVED
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AARON SINGLETON

Write the full name of each plaintiff.

No. _____
(To be filled out by Clerk's Office)

-against-

CITY OF NEW YORK

COMPLAINT

(Prisoner)

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☐ Other: _____

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

AARON

First Name

SINGLETON

Middle Initial

Last Name

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

2411900477

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

VERNON GAIN BAIN CENTER

Current Place of Detention

1 HALLECK STREET

Institutional Address

BRONX NY 10474

County, City

State

Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

☐ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

☒ Convicted and sentenced prisoner

☐ Other: _____

INDIVIDUAL AND OFFICIAL CAPACITIES
FOR ALL DEFENDANTS !!!

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1:

RALPH FABRIZIO
First Name Last Name Shield #
BRONX COUNTY SUPREME COURT JUSTICE
Current Job Title (or other identifying information)
265 EAST 161TH STREET
Current Work Address
BRONX NEW YORK 10451
County, City State Zip Code

Defendant 2:

ALLISON J KLINE
First Name Last Name Shield #
ASSITANT DISTRICT ATTORNEY BRONX COUNTY
Current Job Title (or other identifying information)
198 EAST 161TH STREET
Current Work Address
BRONX NEW YORK 10451
County, City State Zip Code

Defendant 3:

DINO DAVILA
First Name Last Name Shield #
CITY OF NEW YORK POLICE DEPARTMENT
Current Job Title (or other identifying information)
BRONX NEW YORK
Current Work Address
County, City State Zip Code

Defendant 4:

HEIDI GROSSMAN
First Name Last Name Shield #
DEPUTY COMMISSIONER FOR LEGAL MATTERS / GENERAL COUNSEL
Current Job Title (or other identifying information)
75-20 ASTORIA BOULEVARD
Current Work Address
EAST EIMHURST, NEW YORK 11370
County, City State Zip Code

NYC DEPARTMENT
OF CORRECTIONS



DEFENDANT INFORMATION CONTINUED:

Defendant 5: DARCEL D CLARK #2110633
FIRST LAST

BRONX COUNTY DISTRICT ATTORNEY
current job title

198 EAST 161TH STREET BRONX, NEW YORK 10451
current work address

Defendant 6: JESSE HOBBERMAN KELLY
FIRST LAST

18 B PANEL ATTORNEY
current job title

888 GRAND CONCOURSE BRONX, NEW YORK 10451

(3) BRONX SUPREME COURT

265 EAST 161TH STREET

BRONX, NEW YORK 10451

V. STATEMENT OF CLAIM

Place(s) of occurrence: ⁽¹⁾ 20 RICHMAN PLAZA BRONX, NEW YORK / ^{(2) NIC} 1500 HAZEN STREET EAST ELMHURST, NEW YORK

Date(s) of occurrence: 11/30/2020
10/7/2018 ↑ 4/30/2021 / 7/15/2021 / 12/16/2021

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

ON 10/7/2018 I WAS SUBJECTED TO AN ILLEGAL SEARCH AND SEIZURE AND POLICE MISCONDUCT, BY POLICE OFFICERS FROM THE 46 PRECINCT, WHICH RESULTED IN A FALSE ARREST AND FALSE IMPRISONMENT. (BODY CAMERA FOOTAGE FROM 10/7/2018 CAN VERIFY MY CLAIM AND SHOW MISCONDUCT) POLICE OFFICERS MISCONDUCT AND PRACTICES CAUSED THE VIOLATION OF MY FEDERAL AND STATE CONSTITUTIONAL RIGHTS OF UNREASONABLE SEARCH AND SEIZURE IN VIOLATION OF THE FOURTH AMENDMENT AND IN VIOLATION OF NEW YORK STATE CONSTITUTION ARTICLE 1 SECTION 12. I WAS ALSO DEPRIVED OF MY LIBERTY UNDER COLOR OF LAW. NO PROBABLE CAUSE EXISTED ON 11/30/2020 (APPROXIMATELY) ASSISTANT DISTRICT ATTORNEY ALLISON J. KLINE ACTED OUT OF THE SCOPE OF HER OFFICIAL DUTIES WITH PUNITIVE AND MALICE INTENT AND WITH NO PROBABLE CAUSE BY INITIATING A CRIMINAL PROSECUTION WITH NO INJURED PARTY OR ACCUSER, THE PROSECUTOR KNOWINGLY USED FABRICATED AND PERJURED TESTIMONY, UTILIZED PRIVILEGED PHONE CONVERSATIONS IN A TACTICAL MANNER TO SLANDER PLAINTIFF IN COURT PROCEEDINGS, UTILIZED EXTRAJUDICIAL CRUEL AND UNUSUAL PUNISHMENT, FALSIFYING NEW INDICTMENTS, FALSIFYING ORDERS TO PRODUCE, SHIFTING EVERY ASPECT OF THE CONSTITUTIONAL PROCESS TO OBTAIN A CONVICTION. NO MATTER THE HARM, NO MATTER THE LOSS AND THE SEVERE

GREAT VIOLATIONS OF THE FUNDAMENTAL PROCESS BY WHICH THIS
THIS NATION WAS PROPERLY FOUNDED UPON. ALLISON KLINE
SUBJECTED THE PLAINTIFF UNDER THE COLOR OF LAW TO
BE DEPRIVED OF RIGHTS, PRIVILEGES AND IMMUNITIES SECURED
BY THE CONSTITUTIONS BOTH FEDERAL AND STATE AND MUST
BE HELD LIABLE PER TITLE 42 U.S.C. § 1983 FOR THE ABUSE
OF HER POSITION AND MISUSE OF POWER. SHE IS A WIN AT ALL
COST PROSECUTOR WHO IS MORE CONCERNED WITH ADVANCEING
HER CAREER THEN UPHOLDING THE CONSTITUTION. HER

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

CONSTITUTIONAL INJURIES.

PAIN AND SUFFERING, EMOTIONAL DAMAGES

DEPRESSION, MENTAL TORTURE, PHYSICAL PUNISHMENT.

DEPRIVED OF LIBERTY FOR 3 YEARS +

FINANCIAL HARDSHIP TO THE POINT OF BANKRUPTCY

LOSS OF EMPLOYMENT, LOSS OF PERSONAL PROPERTY

VI. RELIEF

State briefly what money damages or other relief you want the court to order.

MONEY DAMAGES 50 MILLION DOLLARS OR

WHAT EVER AMOUNT THE COURT DEEMS JUST AND
PROPER (MINIMUM 1 MILLION DOLLARS)

VACATE ALL FILING FEES IN THE NYCDOC

VACATE ALL STRIKES UNDER THE PRISON LITIGATION ACT

ACTIONS ARE EGREGIOUSLY A FUNDAMENTAL MISCARRIAGE OF JUSTICE. HER MALICE ACTS WERE IN VIOLATION OF MY DUE PROCESS RIGHTS, IN VIOLATION OF MY FIFTH AND FOURTEENTH AMENDMENTS OF THE FEDERAL CONSTITUTION AND IN VIOLATION OF NEW YORK STATE CONSTITUTION ARTICLE 1 SECTION 6. IN VIOLATION OF UNREASONABLE SEARCH AND SEIZURE IN VIOLATION OF THE FOURTH AMENDMENT AND IN VIOLATION OF NEW YORK STATE CONSTITUTION ARTICLE 1 SECTION 12. IN VIOLATION OF CRUEL AND UNUSUAL PUNISHMENT OF THE EIGHTH AMENDMENT OF THE FEDERAL CONSTITUTION AND IN VIOLATION OF THE NEW YORK STATE CONSTITUTION ARTICLE 1 SECTION 5. ON 4/30/2021 JUSTICE RALPH FABRIZIO ACTED OUT OF HIS JUDICIAL RESPONSIBILITIES WITH BAD FAITH AND MALICE INTENT. JUSTICE RALPH FABRIZIO SUBJECTED THE PLAINTIFF TO EXCESSIVE BAIL & CRUEL & UNUSUAL PUNISHMENT BY TAKING AWAY MY BAIL, AND HOLDING THE PLAINTIFF HOSTAGE ON A "REMAND" STATUS WITHOUT THE OPTION OF BEING ABLE TO ATTAIN FREEDOM BY PAYING A RANSOM BY THE NAME OF BAIL (DESPITE CHARGES BEING NON MONETARY ELIGIBLE) IN VIOLATION OF THE EIGHTH AMENDMENT OF THE FEDERAL CONSTITUTION AS WELL AS IN VIOLATION OF THE NEW YORK STATE CONSTITUTION ARTICLE 1, SECTION 5. JUSTICE RALPH FABRIZIO AGAIN ON A DIFFERENT OCCASION ACTED OUTSIDE OF HIS JUDICIAL CAPACITY, ALTHOUGH IT APPEARS JUDICIAL IN NATURE, IT WAS TAKEN IN THE COMPLETE ABSENCE OF ALL JURISDICTION, THE JUSTICE IMPOSED A UNCONSTITUTIONAL ORDER THAT DEPRIVED ME OF →

FREEDOM OF SPEECH IN VIOLATION OF THE FIRST AMENDMENT OF THE FEDERAL CONSTITUTION, ALSO IN VIOLATION OF THE NEW YORK STATE CONSTITUTION ARTICLE 1 SECTION 8. THIS ACT IS A "FUNDAMENTAL MISCARRIAGE OF JUSTICE," ALL DAY ON PLANET EARTH. A DEPRIVATION OF HUMAN RIGHTS, A FORM OF TORTURE UNDER COLOR OF LAW. IT MUST BE DULY NOTED THAT AT THE TIME OF JUSTICE RALPH FABRIZIO'S MISCONDUCT AND TORTURFIOUS ORDERS I WAS A PRETRIAL DETAINEE, WHICH ALSO SUBJECTED ME TO A SUBSTANTIVE AND PROCEDURAL DUE PROCESS VIOLATION, IN COMPLETE VIOLATION OF THE FIFTH AND FOURTEENTH AMENDMENTS OF THE FEDERAL CONSTITUTION AND IN VIOLATION OF THE NEW YORK STATE CONSTITUTION ARTICLE 1 SECTION 6. JUSTICE RALPH FABRIZIO SUBJECTED PLAINTIFF TO EXTREME BIAS AND PREJUDICE WITH HIS MALICE ACTS THAT WERE WITH PUNITIVE INTENT. ON 7/15/2021 I WAS SUSPOSED TO BE REMOVED FROM LOCKDOWN, I HAD TO FILE MULTIPLE ARTICLE 78'S (ESPECIALLY SINCE I DID NOT DO ANYTHING TO WARRANT ^{THE} LOCKDOWN) JUSTICE RALPH FABRIZIO DID NOT MAKE SURE THE DEPARTMENT OF CORRECTIONS ENFORCED HIS ORDER HOW THEY DID WHEN I WAS LOCKED DOWN, I WAS REMOVED FINALLY ON AUGUST 5TH 2021 FROM LOCKDOWN WHICH WAS PURPOSELY DONE BY BOTH ADA ALLISON J KLINE, AND JUSTICE RALPH FABRIZIO WITH THE ASSISTANCE OF THE DEPARTMENT OF CORRECTIONS AND DEPUTY COMMISSIONER FOR LEGAL MATTERS HEIDI GROSSMAN. ON 12/16/2021 I WAS FORCED

TO PLEAD GUILTY. ~~TO~~ DUE TO MY SPEEDY TRIAL RIGHTS BEING VIOLATED, MINIMIZED AND DISCOUNTED IN COMPLETE VIOLATION OF THE SIXTH AMENDMENT OF THE FEDERAL CONSTITUTION, ALSO IN VIOLATION OF NEW YORK STATE CIVIL RIGHTS LAW ARTICLE II, SECTION 12 AS WELL AS IN VIOLATION OF CPL 30.20 & 30.30. AS A PRETRIAL DETAINEE I WAS SUBJECTED TO FORCED LIVING CONDITIONS, THAT HAVE BEEN MORE THAN HORRIBLE AND GROSSLY INHUMANE AND TORTUROUS IN EVERY WAY, WITHOUT BEING DULY CONVICTED OF A CRIME, FOR AN EXTENDED AMOUNT OF TIME UNDER THE FALSE PRETENSE OF AWAITING TRIAL, AT THE TIME OF THIS 1983 COMPLAINT IT HAS BEEN 3 YEARS. THE PLAINTIFF HAS BEEN FAR RAILROADED IN CORRUPT PROCEEDINGS IN WHICH THE DEFENDANTS HAS SHIFTED EVERY ASPECT OF THE CONSTITUTIONAL PROCESS TO OBTAIN A CONVICTION NO MATTER THE COST, NO MATTER THE HARM, NO MATTER THE LOSS AND THE SEVERE GREAT VIOLATIONS OF THE FUNDAMENTAL PROCESS BY WHICH THIS NATION WAS PROPERLY FOUNDED UPON. THIS NEED^{TO} BE DULY NOTED JESSE HOBERMAN KELLY - THE STATE PAID ATTORNEY PROVIDED AGAINST MY WILL BY THE 18B PANEL BRONX COUNTY, AND A JUSTICE FROM THE BRONX SUPREME COURT, PROVIDED INEFFECTIVE ASSISTANCE IN VIOLATION OF THE RIGHT TO COUNSEL OF THE SIXTH AMENDMENT OF THE FEDERAL CONSTITUTION, AND IN VIOLATION OF NEW YORK CONSTITUTION (STATE) ARTICLE 1 SECTION 6. THE STATE PAID ATTORNEY FAILED TO:

A. VISIT THE PLAINTIFF

B. INFORM THE PLAINTIFF OF ANY PERTINENT MOTION MADE

C. CONDUCT AN INVESTIGATION IN THE MATTER OF THE FACTS ASSERTED. FOR THESE STATED REASONS AND OTHERS, THE STATE PAID ATTORNEY HAS NOT PROVIDED A FORM OF DEFENSE, AND HAS ONLY PUSHED A "COP OUT" DEAL AND EMBEZZIED MONEY FROM THE 186 PANEL. THE ATTORNEY NEVER CONFERED WITH THE PLAINTIFF WITHOUT UNDUE DELAY AND AS OFTEN AS NECESSARY TO ELICIT MATTERS OF DEFENSE, THE ATTORNEY NEVER CONDUCTED AN APPROPRIATE INVESTIGATIONS, BOTH FACTUAL AND LEGAL. THE ATTORNEY HAS A RESPONSIBILITY TO PROVIDE HIS/HER CLIENT, WITH THE BEST ADVICE, THAT ATTORNEY MUST ULTIMATELY NOT ONLY CONSULT, BUT TAKE INTO ACCOUNT THE NEEDS AND DESIRES OF HIS/HER CLIENT THIS WAS NEVER DONE. THE DENIAL OF OPPORTUNITY FOR APPOINTED COUNSEL TO CONFER AND TO CONSULT WITH THE ACCUSED AND TO PREPARE A DEFENSE WOULD CONVERT THE APPOINTMENT OF COUNSEL INTO A SHAM AND NOTHING MORE THAN A FORMAL AND FALSE COMPLIANCE WITH THE CONSTITUTIONAL REQUIREMENT THAT AN ACCUSED BE GIVEN THE ASSISTANCE OF COUNSEL. THE CONSTITUTION'S GUARANTEE OF ASSISTANCE OF COUNSEL CANNOT BE SATISFIED BY MERE FORMAL APPOINTMENT. NONE OF THESE LISTED CONCEPTS HAVE BEEN PRESENTED. I WAS DENIED THE OPPORTUNITY TO BE PRESENT AT MY HABEAS CORPUS AT THE HANDS OF JESSE HOBERMAN KELLY WHICH IS A GREAT VIOLATION OF THE FUNDAMENTAL PROCESS OF THE HABEAS CORPUS. THE STATE PAID ATTORNEY ALSO ^{ON} MULTIPLE OCCASIONS INVOKED MENTAL DISEASE AND OR MENTAL DEFECT ALLEGATIONS FORCED UPON THE PLAINTIFF AS A TACTIC TO SEEK RETALIATION

RETALIATION FOR FILING INEFFECTIVE COUNSEL CLAIMS AND GRIEVANCES. THIS ATTORNEY CONSPIRED WITH THE DISTRICT ATTORNEY AND ACTED AS A AGENT OF THE STATE (STATE ACTOR) AND VIOLATED THE LAWYER CLIENT CONFIDENTIALITY AGREEMENT, TURNING OVER INFORMATION (SENSITIVE) TO THE DISTRICT ATTORNEYS AND JUSTICES, AND SABOTAGED MULTIPLE ^(WRITS) DOCUMENTS AND THE CASE THIS ATTORNEY INJURED THE PLAINTIFF UNDER COLOR OF LAW BY PROVIDING INEFFECTIVE COUNSEL, CONSPIRING WITH THE DISTRICT ATTORNEY TO RAILROAD PLAINTIFF, IN CORRUPT PROCEEDINGS AND SHIFTING EVERY ASPECT OF THE CONSTITUTIONAL PROCESS TO OBTAIN A CONVICTION AND CONSPIRING WITH THE DISTRICT ATTORNEY AND SABOTAGING THE CASE ACTING AS AN AGENT OF THE STATE IN A DECEPTIVE WAY.

DARCELL D CLARK WAS INFORMED ON MULTIPLE OCCASIONS VIA JUDICIAL NOTICES, ABOUT HER SUBORDINATES COMMITTING WRONGFUL ACTS AGAINST THE PLAINTIFF, AFTER BEING INFORMED OF THE VIOLATIONS, FAILED TO REMEDY THE WRONG. DARCELL D CLARK WAS GROSSLY NEGLIGENT IN SUPERVISING HER SUBORDINATE (ALLISON J KLINE) WHO COMMITTED THE WRONGFUL ACTS, AND EXHIBITED A DELIBERATE INDIFFERENCE TO THE RIGHTS OF THE PLAINTIFF BY FAILING TO ACT ON INFORMATION INDICATING UNCONSTITUTIONAL ACTS WERE OCCURRING DARCELL D CLARK WAS PERSONALLY INVOLVED IN WHAT OCCURRED THE PLAINTIFF IS IN IMMINENT DANGER OF DEATH WITH LIVING CONDITIONS AND HEALTH

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

JANUARY 17TH 2022

Dated

Aaron Singleton

Plaintiff's Signature

AARON

SINGLETON

First Name

Middle Initial

Last Name

VCBC 1 HALECK STREET

Prison Address

BRONX, NY 10474

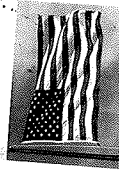
County, City

State

Zip Code

Date on which I am delivering this complaint to prison authorities for mailing:

1/17/2022



FOREVER / USA

RECEIVED
JAN 25 2022
FBI NEW YORK

VERNON CAIN BAIN CENTER

1 HALLECK STREET

BRONX, NEW YORK 10474

C/O Aaron SINGLETON #2411900477

SOUTHERN DISTRICT OF NEW YORK UNITED STATES COURT

500 PEARL STREET

NEW YORK, NY 10007

ATTN: PRO SE INTAKE UNIT

URGENT LEGAL MAIL

URGENT
LEGAL
MAIL

RECEIVED
JAN 25 2022
FBI NEW YORK

